

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE**

Just City, Inc.,

Plaintiff.

v.

Floyd Bonner Jr.,

Shelby County Sheriff;

Bill Anderson Jr.,

**Presiding Shelby County General
Sessions Criminal Court Judge; and**

John Marshall, Robert Barber, Rhonda Harris,
Kevin Reed, Christopher Ingram, Shayla
Purifoy, Ross Sampson, Serena Gray, Terita
Hewlett, Mischelle Best, Kenya Smith, Zayid
Saleem, Kathy Kirk Johnson, Leslie Mozingo,

**Shelby County Judicial
Commissioners,**

in their official capacities,

Defendants.

Case No. 24-cv-2540

**PLAINTIFF'S UNOPPOSED MOTION TO SUBSTITUTE
SUCCESSOR TO OFFICIAL-CAPACITY DEFENDANT**

Plaintiff respectfully moves this Court for an order under Rule 25(d) of the Federal Rules of Civil Procedure substituting Lee Wilson, in his official capacity as Presiding Shelby County General Sessions Criminal Court Judge, for Bill Anderson Jr., sued in the same official capacity, as a Defendant.

Rule 25(d) states that the successor to a “public official who is a party in an official capacity” is “automatically substituted as a party” and “[l]ater proceedings should be in the substituted party’s name.” Fed. R. Civ. P. 25(d). *See Lovelace v. Kijakazi*, 2021 WL 4441606, at *1 n.1 (N.D. Ohio Sept. 28, 2021) (automatically substituting successor under Rule 25(d)). Judge Wilson has succeeded Judge Anderson as the Presiding Shelby County General Sessions Criminal Court Judge. Accordingly, Just City respectfully requests that the Court direct the Clerk to amend the case caption to remove Bill Anderson Jr. as a Defendant and add Lee Wilson as a Defendant in his official capacity as Presiding Shelby County General Sessions Criminal Court Judge.

Respectfully submitted,

Date: Oct. 18, 2024

/s/ Trisha Trigilio

Trisha Trigilio
Tex. Bar No. 24075179
Julian Clark
Ashika Verriest
American Civil Liberties Union Foundation
Criminal Law Reform Project
125 Broad Street, 17th Floor
New York, NY 10004
(347) 302-2797
trishat@aclu.org

Stella Yarbrough
American Civil Liberties Union
Foundation of Tennessee
P.O. Box 120160
Nashville, TN 37212
(615) 320-7142
syarbrough@aclu-tn.org

Craig S. Waldman
David Elbaum
Jared Quigley
Simpson Thacher & Bartlett LLP
425 Lexington Avenue
New York, NY 10017
(212) 455-2000
cwaldman@stblaw.com
david.elbaum@stblaw.com
jared.quigley@stblaw.com

Attorneys for Plaintiff Just City, Inc.

CERTIFICATE OF CONSULTATION

I certify that I consulted with counsel for Defendants (Julia Hale) and the State of Tennessee (Miranda Jones) about the relief sought in this motion by email on October 10 and 18, 2024. The parties have no objection to this motion.

/s/ Trisha Trigilio

Trisha Trigilio

Tex. Bar No. 24075179

American Civil Liberties Union Foundation

Criminal Law Reform Project

125 Broad Street, 17th Floor

New York, NY 10004

(347) 302-2797

trishat@aclu.org